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*Attorneys for Defendants*  
TRAVIS MOREDA DAIRY and TRAVIS  
MOREDA

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

CALIFORNIANS FOR ALTERNATIVES TO  
TOXICS,

Plaintiff,

vs.

TRAVIS MOREDA DAIRY and TRAVIS  
MOREDA,

Defendants.

Case No. 3:24-CV-06632-SI

**STIPULATED REQUEST FOR ORDER  
EXTENDING INITIAL CASE  
MANAGEMENT CONFERENCE  
DATES (L.R. 6-1, 6-2); [PROPOSED]  
ORDER**

*[Filed concurrently with Declaration of  
Alexander Moore]*

*Assigned for all purposes to the  
Honorable Susan Illston*

**STIPULATION**

Pursuant to Local Rules 6-1 and 6-2, as supported by the accompanying Declaration of Alexander Moore, Plaintiff Californians for Alternatives to Toxics (“CAT”) and Defendants Travis Moreda and Travis Moreda Dairy (collectively “TMD,” and together with CAT, the “Parties”) through undersigned counsel hereby stipulate and respectfully request that the Court continue the Initial Case Management Conference, and the deadline for the Parties’ joint case management statement, by approximately 90 days. The Parties declare the following in support of this request:

WHEREAS, on November 22, 2024, the Court granted TMD’s Motion to Extend Time, extending TMD’s time to respond to CATs’ Complaint from November 25, 2024 to December 27, 2024, and extending all deadlines set by the Court’s Initial Case Management Scheduling Order and ADR Deadlines by 30 days (ECF No. 11);

WHEREAS, on January 2, 2025, the Court granted TMD’s Unopposed Motion for Extension of Time to File Answer, extending TMD’s time to file its Answer from December 27, 2024 to December 30, 2024 (ECF No. 15);

WHEREAS, on January 27, 2025, the Court granted the Parties’ Stipulated Request to Extend Deadlines Set by Court, extending the deadline for the Parties’ joint case management statement until April 11, 2025, and setting the Initial Case Management Conference for April 18, 2025 (ECF No. 19);

WHEREAS, the Parties have and continue to engage in good-faith settlement discussions, and have exchanged settlement proposals;

WHEREAS, on March 28, 2025, the Parties met and conferred and agreed to engage in an Early Settlement Conference with a U.S. Magistrate Judge;

WHEREAS, on April 4, 2025, the Parties filed a Stipulation and [Proposed] Order Selecting ADR Process (ECF No. 20);

1 WHEREAS, on April 4, 2025, the Parties timely exchanged their initial  
2 disclosures as required by Federal Rule of Civil Procedure 26;

3 WHEREAS, the Parties believe the Early Settlement Conference will  
4 facilitate settlement discussions and may resolve this case while conserving the  
5 expenditure of attorneys' fees and costs in litigation;

6 WHEREAS, the Parties therefore jointly request a continuance of the Initial  
7 Case Management Conference for approximately 90 days, to a date convenient for  
8 the Court's calendar, and a corresponding continuance of the deadline for the joint  
9 case management statement, so that the Parties may first proceed with the Early  
10 Settlement Conference.

11 WHEREFORE, the Parties hereby stipulate and respectfully request that the  
12 Court continue all case deadlines as follows:

- 13 (1) The deadline for the Parties to file their joint case management statement  
14 will be extended from April 11, 2025 to July 11, 2025; and  
15 (2) The date for the Court to hold its initial Case Management Conference will  
16 be extended from April 18, 2025 to July 18, 2025.

17 Respectfully submitted,  
18 Dated: April 8, 2025 KING & SPALDING LLP


19  
20 By: /s/ Alexander Moore  
Alexander Moore  
21 *Attorneys for Defendants*

22  
23 Dated: April 8, 2025 LAW OFFICE OF WILLIAM CARLON

24  
25 By: /s/ William N. Carlon Signature authority granted via email on 4/8/2025  
William N. Carlon  
26 *Attorneys for Plaintiff*  
27  
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**PURSUANT TO STIPULATION, AND GOOD CAUSE SHOWN, IT IS SO ORDERED.**

Dated: April 8, 2025

  
Honorable Susan Illston  
United States District Judge

**ATTESTATION**

Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: April 8, 2025

KING & SPALDING LLP

By: /s/ Alexander Moore  
Alexander Moore

*Attorneys for Defendants*

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TRAVIS MOREDA DAIRY and TRAVIS  
MOREDA,

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Case No. 3:24-CV-06632-SI

**DECLARATION OF ALEXANDER  
MOORE IN SUPPORT OF  
STIPULATED REQUEST FOR ORDER  
EXTENDING INITIAL CASE  
MANAGEMENT DATES (L.R. 6-1, 6-2)**

*[Filed concurrently with Stipulated  
Request]*

*Assigned for all purposes to the  
Honorable Susan Illston*

**DECLARATION OF ALEXANDER MOORE**

I, Alexander Moore, declare and state as follows:

1. I am an associate at King & Spalding LLP and am licensed to practice law in the State of California. I represent Travis Moreda and Travis Moreda Dairy (collectively, “TMD”) in the above-captioned matter. I have personal knowledge of the facts set forth herein, and if called as a witness I could and would competently testify thereto.

2. On November 22, 2024, the Court granted TMD’s Motion to Extend Time, extending TMD’s time to respond to the Complaint from November 25, 2024 to December 27, 2024, and extending all deadlines set by the Court’s Initial Case Management Scheduling Order and ADR Deadlines by 30 days (ECF No. 11).

3. On January 2, 2025, the Court granted TMD’s Unopposed Motion for Extension of Time to File Answer, extending TMD’s time to file its Answer from December 27, 2024 to December 30, 2024 (ECF No. 15).

4. On January 27, 2025, the Court granted the parties’ Stipulated Request to Extend Deadlines Set by Court, extending the deadline for the Parties’ joint case management statement until April 11, 2025, and setting the Initial Case Management Conference for April 18, 2025 (ECF No. 19).

5. The parties have and continue to engage in good-faith settlement discussions and have exchanged settlement proposals.

6. On March 28, 2025, the parties met and conferred and agreed to engage in an Early Settlement Conference with a U.S. Magistrate Judge.

7. On April 4, 2025, the parties filed a Stipulation and [Proposed] Order Selecting ADR Process (ECF No. 20).

8. Also on April 4, 2025, the parties timely exchanged their initial disclosures as required by Federal Rule of Civil Procedure 26.

